Case3:12-cv-00632-JSC Document34 Filed08/02/12 Page1 of 6

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1	STROOCK & STROOCK & LAVAN LLP JULIA B. STRICKLAND (State Bar No. 83013)								
2									
3	A. R. KACHADOORIAN (State Bar No. 2406								
4	JEFFREY B. BELL (State Bar No. 269648) 2029 Century Park East								
5	Los Angeles, CA 90067-3086 Telephone: 310-556-5800								
	Facsimile: 310-556-5959								
6	Email: lacalendar@stroock.com								
7	Attorneys for Defendant								
8	TRANS UNION LLC								
9	LINITED STATE	S DISTRICT COURT							
10	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA								
11	NORTHERN DIST	RICT OF CALIFORNIA							
12	SAN FRANC	CISCO DIVISION							
13	SERGIO I RAMIREZ on behalf of himself) Case No. 3:12-cv-00632-JSC							
14	SERGIO L. RAMIREZ, on behalf of himself and all others similarly situated,) [Assigned to the Honorable Jacqueline Scott							
	Plaintiff,) Corley] AMENDED							
15	·)) STIPULATION AND [PROPOSED]							
16	V.	ORDER AMENDING BRIEFING SCHEDULE							
17	TRANS UNION, LLC,								
18	Defendant.)							
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WHEREAS, on August 1, 2012, defendant Trans Union, LLC ("Trans Union") filed a	a
Motion for Judgment on the Pleadings Pursuant to Fed. R. Civ. P. 12(c) and to Strike Pursuan	nt to
Fed. R. Civ. P. 12(f) (the "Motion");	

WHEREAS, pursuant to Civil Local Rule 7-3(a), the Opposition of plaintiff Sergio L. Ramirez ("Plaintiff") to the Motion is due not later than August 15, 2012;

WHEREAS, pursuant to Civil Local Rule 7-3(c), Trans Union's Reply in support of the Motion is due not later than August 22, 2012;

WHEREAS, the Motion is set for hearing on October 11, 2012;

WHEREAS, to allow the parties sufficient time to prepare their Opposition and Reply papers, and because Plaintiff's counsel has a vacation scheduled for mid-August, the parties agree that a brief continuance of the foregoing dates is appropriate;

WHEREAS, pursuant to Local Rules 6-1(b) and 6-2, the parties may request an order changing time that would affect the date of an event or deadline already fixed by Court order;

WHEREAS, the parties previously stipulated to the extension of the date by which Trans Union was required to respond to the initial Complaint on March 7, 2012, March 16, 2012 and March 29, 2012;

WHEREAS, this Stipulation is made in good faith and not for purposes of delay; IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that:

- 1. The date by which Plaintiff must file his Opposition to the Motion is continued from August 15, 2012 to September 7, 2012;
- 2. The date by which Trans Union must file its Reply in support of the Motion is continued from August 22, 2012 to September 21, 2012;

Case3:12-cv-00632-JSC Document34 Filed08/02/12 Page3 of 6

	1	3. The hearing date on the M	Iotion shall remain October 11, 2012.
	2	IT IS SO STIPULATED	
	3		
	4		
	5	Dated: August 1, 2012	STROOCK & STROOCK & LAVAN LLP
	6		JULIA B. STRICKLAND STEPHEN J. NEWMAN
	7		BRIAN C. FRONTINO A. R. KACHADOORIAN
	8		JEFFREY B. BELL
	9		
LLP	10		By: /s/ Jeffrey B. Bell Jeffrey B. Bell
Z	11		·
& LAVAN East 0067-3086	12		Attorneys for Defendant TRANS UNION LLC
CK 8 7 Park 1 rnia 90	13		
STROOCK 9 Century Parl les, California 9	14	Dated: August 1, 2012	ANDERSON, OGILVIE & BREWER, LLP
OCK & STROOCK & LAVA) 2029 Century Park East Los Angeles, California 90067-3086	15		ANDREW J. OGILVIE CAROL MCLEAN BREWER
OCK Los Aı	16		FRANCIS & MAILMAN, P.C.
STROOCK Los A	17		JOHN SOUMILAS
δ	18		
	19		By: /s/ John Soumilas John Soumilas
	20		Attorneys for Plaintiff
	21		SERGIO L. RAMIREZ
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	28		-2- STIPULATION AND [PROPOSED] ORDE
			AMENDING BRIEFING SCHEDUL Case No. 3:12-cy-00632-IS

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Los Angeles, California 90067-3086

<u>[PROPOSED]</u> ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _August 2	, 2012	acqueline S. Cong
	,	Hon. Jacqueline Scott Corely
		United States District Court Judge

The hearing is reset for 10/10/12 at 9:00 a.m.

STIPULATION AND [PROPOSED] ORDER AMENDING BRIEFING SCHEDULE Case No. 3:12-cv-00632-JSC Los Angeles, California 90067-3086

DECLARATION OF JEFFREY B. BELL

I, Jeffrey B. Bell, hereby declare as follows:

- 1. I am admitted to practice before this Court and am associate at Stroock & Stroock & Lavan LLP ("Stroock"), counsel for defendant Trans Union, LLC in this action. I submit this Declaration in support of the Stipulation and [Proposed] Order Amending Briefing Schedule (the "Stipulation"), in accordance with Section X.B. of General Order 45 and Civil Local Rule 5-1(i)(3) of this Court. The facts set forth herein are true of my own personal knowledge. If called as a witness, I could and would competently testify thereto.
- 2. On August 1, 2012, John Soumilas, counsel for plaintiff Sergio L. Ramirez, contacted me by e-mail and approved the content of the Stipulation, which was sent to him for his review and approval on July 31, 2012, and authorizing me to execute it on his behalf.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this August 1, 2012.

/s/ Jeffrey B. Bell	
Jeffrey B. Bell	

STIPULATION AND [PROPOSED] ORDER AMENDING BRIEFING SCHEDULE Case No. 3:12-cv-00632-JSC Los Angeles, California 90067-3086

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CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2012, a copy of the foregoing **STIPULATION AND** [PROPOSED] ORDER AMENDING BRIEFING SCHEDULE was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's EM/ECF System.

/s/ Jeffrey B. Bell
Jeffrey B. Bell

STIPULATION AND [PROPOSED] ORDER AMENDING BRIEFING SCHEDULE Case No. 3:12-cv-00632-JSC